

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
WICHITA FALLS DIVISION

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UNITED STATES ATTORNEY  
DALLAS, TEXAS

UNITED STATES OF AMERICA       §  
  §  
v.                                   §       No. 7:12-CR-005-O (32)  
  §  
CHANCE TERRELL DOTSON (32)   §

FACTUAL RESUME

Chance Terrell Dotson, the defendant, Andrew Ottaway, the defendant's attorney, and the United States of America (the government), agree that the following is true, correct and can be used to support Dotson's plea of guilty to Count One of the third superseding indictment:

Elements of Count One

To prove the offense alleged in Count One of the third superseding indictment, a violation of 21 U.S.C. § 846, conspiracy to possess with intent to manufacture and to manufacture Schedule II controlled substance, namely, methamphetamine, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(B)(viii), the United States must prove each of the following elements beyond a reasonable doubt:

*First:*           That two or more persons, directly or indirectly, reached an agreement to possess with intent to manufacture and to manufacture 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine;

*Second:*        That Dotson knew the unlawful purpose of the agreement; and

*Third:* That Dotson joined in the agreement willfully, that is, with the intent to further its unlawful purpose.

Facts


Beginning at least as early as October 7, 2010, and continuing through at least June 6, 2012, the exact dates being unknown, in the Wichita Falls Division of the Northern District of Texas and elsewhere, the defendant, Chance Terrell Dotson, and other persons both known and unknown agreed to and engaged in the manufacture of methamphetamine, a Schedule II controlled substance.


Dotson admits that on numerous occasions between October 7, 2010, and June 6, 2012, the exact dates being unknown, he purchased pseudoephedrine tablets for the purpose of manufacturing methamphetamine. Dotson obtain the pseudoephedrine tablets, a necessary ingredient to manufacture methamphetamine, from numerous Walmart stores located in the Houston, Texas, area. Dotson presented his Texas driver's license, which listed his home address as an apartment on North Ervay, Dallas, Texas, when he purchased the pseudoephedrine tablets. Dotson admits that he purchased pseudoephedrine from as many as 17 different Walmart stores in a single day. Dotson arranged to sell the pseudoephedrine tablets to co-defendant Steve Ysasaga, among others. Dotson arranged these sales with Ysasaga via cellular telephone. Sometimes Ysasaga drove to Houston, Texas, to obtain the pseudoephedrine tablets from Dotson; other times, Dotson transported the tablets to Wichita Falls.

Dotson further admits that during the course of the conspiracy, he purchased 286 boxes of pseudoephedrine that contained a total of 435.84 grams of pseudoephedrine. Based on the ability to manufacture two grams of methamphetamine from each box of pseudoephedrine, Dotson obtained pseudoephedrine capable of manufacturing approximately 572 grams of methamphetamine.


Dotson admits that at least as early as October 2010 and continuing through at least June 2012, in the Wichita Falls Division of the Northern District of Texas and elsewhere, he and other co-conspirators both named and unnamed in this indictment did knowingly, intentionally, and unlawfully combine, conspire, confederate and agree together and with each other and with person both known and unknown, to commit certain offense against the United States, namely, to manufacture and to possess with intent to manufacture 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(viii) and 846.

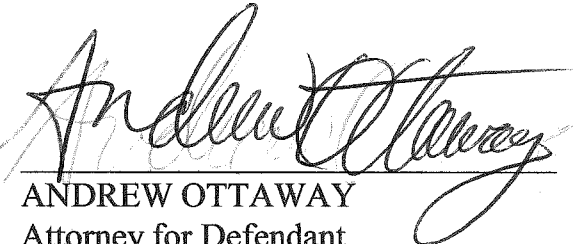
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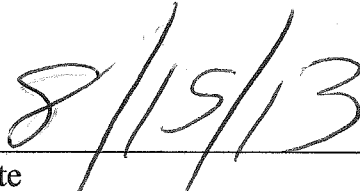
  
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MARY F. WALTERS  
Assistant United States Attorney

  
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RICK CALVERT  
Deputy Chief

  
\_\_\_\_\_  
CHANCE TERRELL DOTSON  
Defendant

  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
ANDREW OTTAWAY  
Attorney for Defendant

  
\_\_\_\_\_  
Date